

From: [REDACTED]
To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Cc: [REDACTED]
Subject: Hills of gold wind farm
Date: Monday, 8 July 2024 8:10:52 PM
Attachments: [Hills of Gold Wind Farm.pdf](#)

Hello,

I would like to submit the attached letter relating to the Hills of Gold wind farm.

My submission is a negative submission

My Postcode is 2795

I am a concerned member of the community, suffering similar negative treatment by energy project developers in NSW.

My contact details are, [REDACTED]

I want my name redacted from the submission for fear of reprisal by developers and host landholders in my case.

Hills of Gold Wind Farm

I object to this project unless, as a minimum, the social licence issues can be resolved.

I am a concerned community member who is facing similar poor treatment by energy project developers in NSW and am lending my voice to the affected community and neighbouring landholders of the Hills of Gold wind farm. I have visited Nundle on numerous occasions and do not want to see more of our last remaining undeveloped places fall in the name of progress.

Issue 1- Social licence

I have reviewed the available information regarding the Hills of Gold wind farm and cannot see how this project could be supported given the poor performance of the proponents as evidenced in the DPHI correspondence and the proponents own clearly evidenced willingness to expend significant effort to discredit the affected landholder(s) (reference Engie HSF letter).

With reference to the available material I have the following objections which largely relate to proper community engagement and the gaining of social licence.

I do not agree with the approach that has been taken here, with the host landholders receiving a \$30million windfall (refer ABC Wind Wars <https://www.youtube.com/watch?v=w1-ACvrnDWs&t=1870s>) while surrounding landholders are faced with significant impacts and potentially forced acquisition. It is certainly a dangerous precedent to set, per DPHI comments, that compulsory acquisition under VLAMP terms, which are not favourable to the landholder, will be applied here.

The impacts of a project such as this do not stop at a boundary fence, why does Engie seem to think that its OK to force a project such as this upon unwilling members of the community rather than sharing the benefits amongst affected parties and building social licence through genuine actions.

Social licence is not gained through consultation alone, if there are impacts on neighbouring landholders then real benefits must flow to these parties and not just the targeted benefit to the hosts. DPHI clearly state that these affected landholders should be considered with similar weighting as hosts on a project.

Its pretty clear that there were ample funds available to ensure all parties were appropriately compensated. This approach would significantly speed up the development consent process and bring about improved deployment timeframes and broader community acceptance of projects such as this. Instead, it appears that Engie would prefer to disregard this, for their own benefit, while tarnishing the reputation of the broader industry.

It is important to note that hosts, such as in this case, are remunerated to such an extent that they can choose to leave the area and not endure the impacts of the project while neighbouring landholders will be left with devalued properties and potentially unable to sell to allow them to move away from the project. Effectively these people get hit two ways, firstly their property is devalued or potentially rendered unsaleable and, if a successful sale is able to be made they are forced into an unwanted taxation event, this is not a fair and reasonable burden to place on landholders.

Inaction or poor management by Engie should not be rewarded with unfavourable acquisition rights over a private landholder.

Engie's own statement is quite telling, refer HSF letter **"The public benefit in renewable energy generation outweighs the private disbenefits to individual landowners"**. There is a direct admission in this statement that there is a disbenefit to the landholder. Clearly Engie is more concerned with their own profit driven motivations, and it is not in any way justifiable for an individual to shoulder the hugely disproportionate burden of the public interest or in this case private benefit that Engie will enjoy through revenue generated by this project.

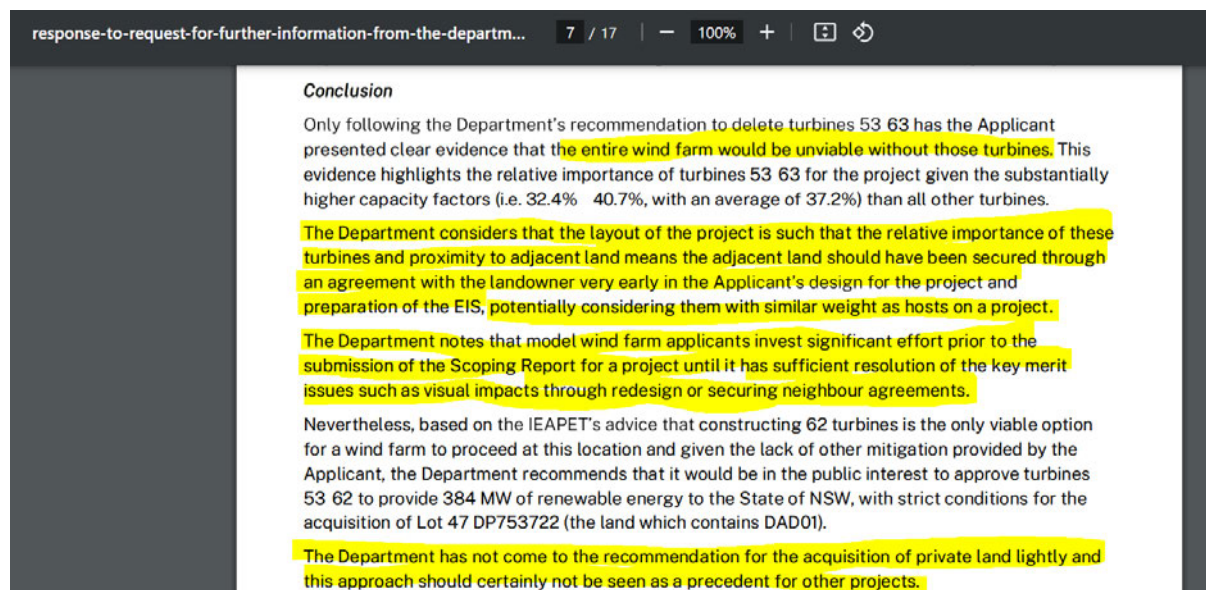
All of this is in direct conflict with the recently released AEIC recommendations, key items from this are as follows,

In particular, the Review identified the following needs:

- ***encourage best practice and select reputable developers for new projects***
- ***reduce unnecessary and onerous community engagement by improving the selection of project sites***
- ***equitably share the benefits of the transition.***

The Engie approach to community engagement appears to have failed on all three of these points and therefore should not be granted an approval unless these can be resolved.

Supporting DPHI correspondence highlighted below.



Issue 2- location of the project

There are significant areas of state forest (pine plantation) on top of the escarpment and relatively close to the proposed development site. Why has this location been overlooked by Engie in favour of placement on private land which has numerous neighbours?

Siting of large scale infrastructure such as this should be kept as far as practicable from private landholders in an effort to minimise impacts.

In addition to this, placement on government owned land would result in royalties going back to the state rather than private landholders/hosts. This is a far better outcome where benefits could be directed to local communities through improved roads, schools and services in general. This would further improve social licence for projects.

Issue 3- Project Viability

Engie suggest that the profitability of the entire 62 turbine project hinges on the turbines that were to be removed due to significant impacts on neighbouring properties. Is the business case really this marginal? If so, then what happens if the LCOE of energy begins falling, as is expected, with greater penetrations of renewable energy into the market? Will the community be left with an abandoned project and rehabilitation to be borne by the taxpayer?

This project certainly seems to be based on questionable grounds.

Issue 4- visual amenity

Nundle and surrounds draw tourists, sightseers and outdoors enthusiasts, very specifically due to the remote and undeveloped nature of the landscape. A 60+ wind turbine development placed in a prominent location will significantly detract from this and is not in keeping with the rural character of the location.